

EXHIBIT J

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF HERMAN WEISBERG IN SUPPORT OF PLAINTIFFS’
SUBMISSION REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Herman Weisberg, declare as follows:

1. I am the Managing Director of SAGE Intelligence Group (“SAGE”), an investigation, digital forensics, and security firm. The lawyers for the Plaintiffs in *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM retained me to provide security services.

2. I provide this declaration in support of Plaintiffs’ Submission Regarding Venue for Trial and Trial Logistics.

3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.

4. I have been the Managing Director of SAGE since 2010. Prior to joining SAGE, I was a New York City Police Department (“NYPD”) Officer for twenty years. While with the NYPD, I worked in the Intelligence Division, where I underwent Dignitary Protection training and led advance work for dignitaries, including President George Bush and Vice President Al Gore, in New York City. I was ultimately promoted to Detective Second Grade and assigned to the New York District Attorney’s Detective Squad where I regularly coordinated with law enforcement agencies around and outside of the country.

5. SAGE has also done extensive advance work since 2019 in Charlottesville to ensure the safety of Plaintiffs and their counsel at trial.

6. SAGE has communicated and coordinated with local law enforcement, including leadership in the Charlottesville Police Department and the U.S. Marshall Service, to create an operational plan for the trial.

7. Based on my discussions in with the Charlottesville Police Department, it is my assessment that they are taking all necessary steps to ensure proper security during the trial and that they are also coordinating with the Virginia State Police in order to do so.

8. SAGE employees have also visited the courthouse in Charlottesville to identify any potential security vulnerabilities, determine the safest points of ingress and egress, and to meet with courthouse security personnel to develop a plan for any potential future security emergencies.

9. In addition to investigating and preparing for any potential security concerns at the courthouse in Charlottesville, SAGE has also visited numerous hotels to identify the safest lodging for Plaintiffs' counsel and expert witnesses.

10. During the trial, SAGE plans to provide comprehensive physical security to Plaintiffs and their lawyers. To that end, SAGE has made arrangements to establish a command center for the in-person security detail at a safe location convenient to the courthouse and the hotel where Plaintiffs' counsel will be staying.

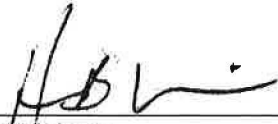
11. The in-person security detail will also provide transportation for Plaintiffs' counsel in Charlottesville. SAGE employees have mapped out the safest route of travel between the courthouse and the locations where Plaintiffs and their lawyers will be staying during the trial.

12. In an abundance of caution, after consultation with local law enforcement and investigation in Charlottesville, SAGE has also developed an approved list of vendors for meals and deliveries in Charlottesville.

13. In short, SAGE has worked for more than a year to ensure that Plaintiffs and their counsel will be safe during the trial in Charlottesville. SAGE's advance work has taken considerable time. It would be challenging for SAGE to replicate its efforts in a new location with only a few months remaining before Plaintiffs' counsel will need to travel to Virginia for trial.

14. If the Court would like further information or details about our efforts, I would be happy to produce them as part of a sealed, in-camera submission. But for obvious reasons, it would be counterproductive for me to make that information publicly available.

15. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 11, 2021.


Herman Weisberg